

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
TUSCALOOSA DIVISION**

JANE DOE #1, and JANE DOE #2, on behalf)
of themselves and all others similarly situated,)

Plaintiffs,)

v.)

MG FREESITES, LTD, d/b/a “PORNHUB”,)
a foreign entity; MG FREESITES II LTD, a)
foreign entity; MINDGEEK S.A.R.L., a)
foreign entity; MINDGEEK USA,)
INCORPORATED, a Delaware corporation;)
MG CY HOLDINGS LTD, a foreign entity;)
MINDGEEK CONTENT RT LIMITED, a)
Foreign entity; 9219-1568 QUEBEC INC.)
d/b/a MINDGEEK, a foreign entity; MG)
BILLING LTD, a foreign entity,)

Defendants.)

**Civil Action No.
7:21-cv-00220-LSC**

**DECLARATION OF M. STEWART RYAN
IN SUPPORT OF MOTION FOR *PRO HAC VICE***

I, M. Stewart Ryan, hereby declare and state the following in support of the Motion for Admission
Pro Hac Vice in the above-captioned matter:

1. I reside at [REDACTED] Havertown PA 19083;
2. I am an attorney with Laffey, Bucci & Kent, LLP, and my office contact

information is as follows:

M. Stewart Ryan
Laffey, Bucci & Kent, LLP
1100 Ludlow Street, Suite 300
Philadelphia, PA 19107
Telephone: 215-399-9255
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3. I have been admitted to the following courts and bars:

- i. Supreme Court of Pennsylvania (admitted November 1, 2012)
 - ii. Supreme Court of New Jersey (admitted January 7, 2013)
 - iii. Eastern District Court of Pennsylvania (admitted 2018)
4. I am currently in good standing with all states, courts, and bars in which I am admitted.
5. I have not previously been admitted *pro hac vice* in this Court.
6. I do not have an office located within the State of Alabama.
7. In the above-captioned matter, I will represent my clients as co-counsel along with the following local members of the bar of this Court:

Gregory Zarzaur (ASB-0759-E45Z)
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I declare under penalty of perjury that the foregoing is true and corrected. Executed in Philadelphia, Pennsylvania, this 22nd day of February 2021.



M. Stewart Ryan, Esq.